

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

UNITED STATES OF AMERICA,)
)
 Plaintiff,)
)
vs.) Case No.: 4:15-cr-403-2 HEA (SPM)
)
CHARLES FLOWERS,)
)
 Defendant.)

**SECOND MOTION TO EXTEND THE TIME IN WHICH TO FILE PRETRIAL
MOTIONS**

COMES NOW Defendant, Charles Flowers, by and through counsel, and hereby moves this Court to extend the time in which to file pretrial motions by a period of thirty (30) days. In support of this motion, Defendant states as follows:

1. Defendant was arraigned on September 8, 2015 on an alleged violation of title 21 U.S.C. § 841(a)(1).
2. Counsel for Defendant has received discovery, consisting of five (5) discs with many recorded calls. Counsel has completed a review of much of the material but a portion remains.
3. Counsel has sent a copy of the material to Defendant for his review.
4. Counsel has been in communication with the government in the hope of coming to an agreed upon disposition that would obviate the need for motions, but those discussions are incomplete.
5. Counsel requests additional time to complete his review of the material and

continue discussions with the government.

6. For these reasons, Defendant files the instant motion.

7. For this same reason, the instant motion is necessary to provide counsel for the “defendant...the reasonable time necessary for effective preparation, taking into account the exercise of due diligence.” 18 U.S.C. § 3161(h)(7)(B)(iv). Accordingly, “the ends of justice served by [granting this motion] outweigh the best interest of the public and the defendant in a speedy trial.” 18 U.S.C. § 3161(h)(7)(A).

8. Defendant, through counsel, has spoken with Assistant United States Attorney Sirena Wissler. Ms. Wissler does not object to Defendant’s motion.

WHEREFORE, Defendant respectfully requests this Honorable Court extend the time in which to file pretrial motions by a period of thirty (30) days.

Respectfully submitted,

ROSENBLUM, SCHWARTZ, ROGERS & GLASS, PC

By: /S/ Marc M. Johnson
MARC M. JOHNSON, #58065 MO
Attorney for Defendant
120 S. Central Avenue, Suite 130
Clayton, Missouri 63105
(314) 862-4332/Facsimile (314)862-8050

CERTIFICATE OF SERVICE

I hereby certify that on October 29, 2015, the foregoing was electronically filed with the Clerk of the Court to be served by operation of the Court’s electronic filing system upon Ms. Sirena Wissler assistant United States attorney.